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8 Raper Street
SURRY HILLS NSW 2010
31 December 2013

CSELR EIS SUBMISSION
Major Project Assessments
Department of Planning and Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000

**Department of Planning and Infrastructure - CBD and South East Light Rail (CSELR)
Amended Response to Environmental Impact Statement**

I do not agree with the design proposal for the CBD and South East Light Rail project (CSELR) as described in the Environmental Impact Statement (EIS) dated November 2013.

This response replaces the response that I lodged on 26 December 2013.

My concerns relate to the Surry Hills to Moore Park West route and are listed and summarised below:

1. *Lack of business case for overall project and cost benefit of possible routes through Surry Hills*

The Government has failed to provide a business case for the project. The Ministry for Transport and the Minister have been far from transparent in their decision making on this project and the proposed route. Freedom of Information requests for the business case including a cost benefit analysis of light rail (vs. other forms of transport) and for the various alternative Surry Hills routes have been refused. The CSELR EIS is based on Devonshire Street only and the Minister refuses to be moved, and also refuses to release any analysis or costings that support her decision.

As a taxpayer and community member of Surry Hills I want to understand why Devonshire Street is the Government's preferred route for the spine of the South East network, when various other options, that are existing traffic corridors, appear to be superior.

2. *Devonshire street is not capable of being the spine of the SE Network / not sustainable*

The preferred Devonshire Street route is not a sustainable route given it has a maximum capacity of 9,000 per hour each way, and will be at capacity within a 2 or 3 years of operation. Given that the Devonshire Street surface route does not have the potential to expand to a third track, it does not have the ability to expand capacity when the planned activation zones in Kingsford, Kensington and Randwick significantly increase population density and demand for light rail services. Similarly extension of the light rail further to areas such as Maroubra and Botany would not be sustainable.

Surry Hills were advised by the Minister and TfNSW in March 2013 that the route through Surry Hills would be the "spine of the South East network". Given the Devonshire Street surface route does not deliver this future proof solution, ***I do not support of the Devonshire Street surface route.*** If the Government were insistent of this direction between the Stadiums and Central (over the more direct Foveaux route) then my preference would be a Devonshire Street sub-surface.

3. Superior alternative routes have been identified – Foveaux and Devonshire sub-surface

The Surry Hills community has identified an alternative cut and cover proposal along Fitzroy/Foveaux Streets. The Foveaux route delivers greater capacity (through a third line), avoids traffic issues with major intersections, has less residential impact, increased speed for LRV's that will decrease travel times, less visual impact on the local area and no long term noise impact for residents. It also provides for a station in the centre of Surry Hills, and within the area where many buses will be cancelled, rather than one that is a 5-minute walk from Central station (Ward Park).

TfNSW has admitted the analysis of this alternative proposal was not given appropriate time, money or resources, and therefore I believe it has not been given genuine and thoughtful consideration.

Construction along Foveaux Street should be more contained and should have less impact and superior delivery on KPI's. While Devonshire Street be impacted in a major way during construction, and also for all time into the future with the operational impacts not only on Devonshire Street but on traffic flowing north to south through Surry Hills and the risk of accidents on the narrow heavily pedestrianized street.

The Foveaux sub-surface route is designed to minimise impact and optimise deliverables for all stakeholders.

A reason for rejecting the sub-surface (Foveaux and Devonshire) and Tunnel under Surry Hills was cost. Surely cost is not the only evaluation criterion for this very expensive capital project. All alternative routes should be evaluated against the long term stated objectives of:

- an efficient service
- maximum capacity and convenience for passengers along the whole route
- minimum impact on the community
- minimum traffic dislocation
- maximum opportunity for future growth
- maximum safety
- fastest service and maximum capacity between Central and the Moore Park sports and events precinct
- least impact on the streetscape, commercial activity, car , bicycle and pedestrian traffic, parking, trees and parkland amenity.

I understand there may be some technical challenges with the Foveaux sub-surface (which are to be substantiated) however believe they are not insurmountable, using modern technology. Direct construction costs may be greater; however the ongoing benefits outlined for the Foveaux route, far outweigh these, and will benefit the whole route between Circular Quay to Kingsford, Kensington and Randwick, and future network expansions.

Request:

1. Business case studies for transport solutions for the South East Sydney, to be made public to improve transparency of decision-making

2. Cost benefit studies of all possible routes through Surry Hills (surface, sub-surface and tunnels), to be made public to improve transparency of decision-making
3. Genuine modern technical consideration to the Foveaux and Devonshire sub-surface routes; including cost benefit based on 2026
4. The subsurface routes (Foveaux or Devonshire) should be the default option for light rail transit through Surry Hills

4. Community consultation –lack of community consultation by all levels of Government

The CESLR project’s “consultation” can only be regarded as far from best practice. There has been no community involvement, engagement and consultation. The “consultation” is certainly not in accordance with the Government’s own policy document “Community engagement in the NSW planning system”

(http://www.communitybuilders.nsw.gov.au/community_engagement_handbook_part_1.pdf).

The involvement of the local community in the planning of this project has been insulting and a farce. While the Minister and TfNSW claim to have consulted, these “consultation sessions” have in fact been information sessions where decisions have been presented rather than options. Clearly, the community are not seen as stakeholders in relation to this project and have never been consulted. This is not acceptable.

Request:

5. Genuine community consultation and involvement with the local community – residents and business owners about the route through Surry Hills, design and assimilation.

COMMENTS BASED ON THE DEVONSHIRE STREET SURFACE ROUTE

5. Light Rail Vehicles (LRV’s) size, noise impacts

The proposed LRVs are 45 m. long, which is more than 50% longer than the LRVs on the existing Inner West route (those vehicles are 29 m. long). The acceptable noise levels have also been changed by the State Government to match those of heavy rail.

Request:

6. The LRV’s are no longer than 29m long if traveling through residential areas at the surface level. If the LRV’s are longer than 29m, then they are only to travel along specifically tailored routes (such as a sub-surface or tunnel) and or dedicated rights of way (not on residential streets).
7. **Speed to be reduced to 20km** from South Dowling Street to Elizabeth Street
8. Operational times through Surry Hills must limited to 05:30 to 23:30. No light rail movement between 23.30 and 5.30
9. Frequency limited to a minimum of 5 minutes gap of both LRV’s
10. Noise and vibration levels delivered well within the EPA guidelines
11. Continuous rail to reduce noise at expansion joints to be used between South Dowling Street to Elizabeth Streets
12. Maximum noise reducing beds to be installed below the tracks
13. Base to be constructed in a way that limits vibration
14. Significant screening in residential areas must take place

6. Visual impact and loss of trees/ parklands

I am concerned with the large number of large and historic trees that will removed along the route

and in the parklands. There will also be a loss of parklands both during and following construction. It is suggested that a large number of overhead cables would be introduced as part of the light rail through Surry Hills. It is also suggested that substation/s in Surry Hills will be above ground.

Request:

15. All parklands should be replaced 1:1 with improvements on facilities
16. The Government has suggested they will replace trees 1:7 – this should be enforced with a at least 1:1 in the Surry Hills area
17. Light rail and electrical cables to be placed underground to reduce the visual clutter and enable trees to be planted to replace those being cut down.
18. All substations must be below ground.

7. Safety

Safety is a major consideration in this built up area as Devonshire Street. Devonshire Street has numerous licensed venues, there are 2 child care centres on Devonshire Street, a school on Bourke Street, access required to the Church for weddings/ services/ funerals, and 1,000 residents of Northcott building.

There are significant access issues for some residential and commercial buildings along Devonshire Street which do not have rear access at all. There are no back lanes. This raises significant safety issues in relation to fire, but also for residents' access to their own dwellings with trams proposed every 90 seconds.

Request:

19. The safety issues need to be fully reviewed by independent consultants and the full reports made available.
20. The speed must be restricted to a maximum of 20kmph through this section.
21. Frequency limited to a minimum of 5 minutes gap between both vehicles
22. That the safety issue of access to dwellings with no rear access be addressed.

8. Parking

Surry Hills already has serious parking issue. The CESLR project suggests removal of a further 133 parking spots, just along Devonshire Street alone. Whilst we wish to reduce reliance on cars, many residents do need them for work and life. Indeed, as my business takes me to all parts of Sydney, I need a car to earn a living as it would be impossible to visits my clients if I relied on the existing Sydney Transport system. I currently pay a significant amount of money for off street parking. Other residents with similar needs may not be able to afford this outlay.

Request:

23. Resident/Commercial Only spaces in selected areas and temporary parking permits for the occasional visitors of residents and also for tradespeople. This allows those that have a genuine need to park in the area - residents and businesses - greater access to dedicated parking.
24. That the Government and the Council of the City of Sydney actively consider provision of a parking station for residents at affordable community rates to compensate for the loss of street parking.

9. Traffic

The Devonshire route crosses a number of major roads including roads that are critical to access the areas south of Surry Hills. Even now on weekends traffic is very congested and becoming more so with the increasing population densities in Waterloo and Zetland. The road and public transport infrastructure does not appear to have been considered in these developments.

It is suggested in the EIS that the light rail will have uninterrupted priority at all crossings. Indications are that at peak times, when the roads are their busiest, there will be a 45m train every 2-3min in each direction. A simple calculation means that a train will cross the arterial road approximately every 90 seconds. The trains are stated to be doubled in length when there are events at the Sydney Cricket Grounds and Sydney Football Stadiums, thus reducing this gap. The number of vehicles that can then cross-junctions at South Dowling, Bourke, Crown, Elizabeth and Chalmers Streets, will be significantly reduced and cause significant traffic congestion south of Cleveland Street.

TfNSW has offered no resolution to the traffic problems that will be caused by the light rail.

I have a particular issue with access to streets bordering Devonshire Street. The residents in my street (Raper St) use Devonshire Street for access via Violet and Esther streets. The EIS does not address access issues for residents. I would appear that it will no longer be possible to turn in to Devonshire Street from Chalmers Street, for example. Similarly the traffic and access arrangements proposed along Devonshire Street are not at all clear in the EIS.

The proposal for the CESLR means significant changes to traffic and access for residents to their properties. The EIS does not address this in any detail. I guess that TfNSW is not that interested as it is primarily a matter for Council.

Request:

25. The frequency of trains should be limited to a minimum of 5 minutes to ensure a suitable gap to allow pedestrians, cyclists and vehicles to cross in safety.

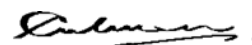
26. That detailed options for changes to traffic and access to properties be made available for proper consultation with residents, not information sessions where decisions are presented.

In summary, if the CESLR project is to proceed, I request that all possible Surry Hills routes be technically reviewed and supported with a cost benefit report (to be made public) demonstrating the preferred route and how it is suitable for the spine of the South East light rail network, enabling future expansion, and ensuring sustainability to meet the needs of increasing population densities, particularly in Kingsford and Kensington.

And I request genuine community consultation, which will help a better outcome for all in the short and long term, and ensure a more positive process for all stakeholders.

I am one of the thousands of people who have signed the PUSH Petition calling for an alternative Surry Hills route, and believe a sub-surface route (Foveaux or Devonshire) should be the default option.

Yours sincerely



Stephen Auburn and Roger Williams

